

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

STACY ARNOLD,

Plaintiff,

v.

CITY OF ST. JOSEPH, ET AL.,

Defendants.

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Case No. 19-CV-06137-BP

**DEFENDANT ST. JOSEPH PUBLIC LIBRARY’S MOTION FOR SUMMARY
JUDGMENT**

COMES NOW, Defendant St. Joseph Public Library (hereinafter “Library”), by and through its attorneys of record, and pursuant to Fed.R.Civ.P. 56, respectfully moves this Court for an Order granting summary judgment in its favor on Plaintiff’s sole remaining claim that Defendant Library’s policy on petitioning and distribution of literature violates the First and Fourteenth Amendments to the United States Constitution. Defendant Library incorporates by reference its memorandum in support filed contemporaneously herewith.

WHEREFORE Defendant St. Joseph Public Library respectfully moves this Court for an Order granting summary judgment in its favor on Plaintiff’s sole remaining claim that Defendant Library’s Policy for Public Assembly and Petitioning and Distribution of Literature on Library District Property violates the First and Fourteenth Amendments to the United States Constitution, and that it be awarded its costs, including reasonable attorneys’ fees, incurred in defending this action and such other relief as the Court deems fair, just and equitable.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of October, 2020 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

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